

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANDREA TANTAROS,

Plaintiff,

- against -

FOX NEWS NETWORK, LLC, ROGER AILES, WILLIAM  
SHINE, IRENA BRIGANTI, PETER A. SNYDER,  
DISRUPTOR, INC. and JOHN DOES 1-50,

Defendants.  
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17 Civ. 2958 (GBD)

**REPLY DECLARATION OF BENJAMIN M. ROSE IN FURTHER SUPPORT OF  
MOTION BY DEFENDANTS FOX NEWS NETWORK, LLC AND IRENA BRIGANTI  
FOR EXPEDITED RULE 11 DISCOVERY**

I, BENJAMIN M. ROSE, hereby declare that:

1. I am an attorney duly admitted to practice before this Court and am an associate of Dechert LLP, 1095 Avenue of the Americas, New York, New York, counsel to Defendants Fox News Network, LLC and Irena Briganti in this case. I submit this declaration to submit relevant documents in further support of the Motion by Defendants Fox News Network, LLC and Irena Briganti for Expedited Rule 11 Discovery.

2. Attached hereto as Exhibit 1 is a true and correct copy of a declaration signed by Michael Krechmer and filed in *Krechmer v. Tantaros*, No. 16 Civ. 7820 (KBF) (S.D.N.Y.), ECF Doc. No. 72, which authenticates the Text Log annexed as Exhibit 1 to my Declaration dated October 6, 2017, ECF Doc. No. 97-1.

3. Attached hereto as Exhibit 2 is a true and correct copy of a news article, *Andrea Tantaros Claims Fox News Targeted Her With 'Digital Weapons,' Online Harassment*, by Ted Johnson, published online by Variety on April 24, 2017.

4. Attached hereto as Exhibit 3 is a true and correct copy of a news article, *Former Fox News Host Alleges Network Operatives Hacked Her Phone As Part of Smear Campaign*, by Gabriel Sherman, published online by New York Magazine on April 24, 2017.


5. Attached hereto as Exhibit 4 is a true and correct copy of a news article, *Andrea Tantaros Claims Fox News "Tortured" Her Via Hacking, Social Media Stalking*, by Eriq Gardner, published online by The Hollywood Reporter on April 24, 2017.

6. Attached hereto as Exhibit 5 is a true and correct copy of a news article, *Ex-Host Claims Fox News Hacked Her, Used Info to 'Emotionally Torture' Her Online*, by Andrew Kirell, published online by The Daily Beast on April 24, 2017.

7. Attached hereto as Exhibit 6 is a true and correct copy of a news article, *Ailes Accuser Says Fox News Execs Ordered Eavesdropping On Her Digital Devices*, by David Folkenflik, published online by National Public Radio on April 24, 2017.

8. Attached hereto as Exhibit 7 is a true and correct copy of a news article, *Former Fox Host Claims Network Hacked Into Her Computer*, by Bob Van Voris, published online by Bloomberg on April 24, 2017.

I declare under penalty of perjury that the foregoing is true and accurate. Executed at New York, New York on October 27, 2017.

  
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Benjamin M. Rose